

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re**

## **Chapter 11**

### **Case No. 01-B-16034(AJG)**

**JP Morgan Chase Bank N.A., Appellant**

**07-cv-07757-CM**

**Baupost Group L.L.C., Abrams Capital, LL.C.,  
Appellees**

**MOTION TO ADMIT COUNSEL  
*PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Matthew J. Gold, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Name: Isaac M. Pachulski  
Firm's Name: Stutman, Treister & Glatt Professional Corporation  
Address: 1901 Avenue of the Stars, 12<sup>th</sup> Floor  
City/State/Zip: Los Angeles, California 90067  
Phone Number: 310-228-5600  
Fax Number: 310-228-5788  
Email Address: ipachulski@stutman.com

Isaac M. Pachulski, is a member in good standing of the Bar of the State of California.

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There are no pending disciplinary proceedings against Isaac M. Pachulski in any state or Federal Court.

Dated: October 11, 2007  
City, State: New York, New York

Respectfully submitted,

Matthew J. Sotell

Matthew J. Gold (SDNY Bar No. MJG 7326)  
Kleinberg, Kaplan, Wolff & Cohen, P.C.  
551 Fifth Avenue, 18<sup>th</sup> Floor  
New York, NY 10176  
Telephone Number: 212-880-9827/  
Fax Number: 212-986-8866  
Email: [mgold@kkwc.com](mailto:mgold@kkwc.com)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**In re**  
**Enron Creditors Recovery Corp., Debtor.**

**Chapter 11**  
**Case No. 01-B-16034(AJG)**

**JP Morgan Chase Bank N.A., Appellant**

**07-cv-07757-CM**

**v.**

**Baupost Group L.L.C., Abrams Capital, LL.C.,**  
**Appellees**

**DECLARATION OF MATTHEW J. GOLD IN  
SUPPORT OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

I, Matthew J. Gold, hereby declare:

1. I am Of Counsel to the law firm of Kleinberg, Kaplan, Wolff & Cohen P.C. in the above captioned case. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit Isaac M. Pachulski ("Mr. Pachulski") as counsel *pro hac vice* to represent The Baupost Group L.L.C. and Abrams Capital L.L.C. in this matter
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1983. I am also admitted to the bar of the United States District Court for the Southern District of New York. I am in good standing with this Court.
3. I have known Mr. Pachulski for approximately eighteen months.
4. Mr. Pachulski is a shareholder at the law firm of Stutman, Treister & Glatt Professional Corporation located at 1901 Avenue of the Stars, 12<sup>th</sup> Floor, Los Angeles, California.
5. I have found Mr. Pachulski to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Mr. Pachulski is a member in good standing of the Bar of the State of California, the United States District Courts for the Central, Eastern, Northern and Southern Districts of California, the United States Courts of Appeal for the First Third, Ninth and Eleventh Circuits, and the Supreme Court of the United States. A Certificate of Good Standing for Mr. Pachulski from the United States District Court for the Central District of California is attached hereto as Exhibit A.

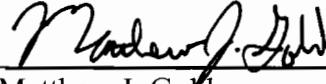
7. Accordingly, I am pleased to move for the admission of Mr. Pachulski, *pro hac vice*.

8. I respectfully submit a proposed form of order granting the admission of Mr. Pachulski, *pro hac vice*, which is attached hereto as Exhibit B.

9. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

WHEREFORE it is respectfully requested that the motion to admit Isaac M. Pachulski, *pro hac vice*, to represent Appellees in the above-captioned matter, be granted.

Executed on October 11, 2007  
New York, New York

  
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Matthew J. Gold  
S.D.N.Y. Bar Code: MJG 7326

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# United States District Court

## Central District of California

### **CERTIFICATE OF GOOD STANDING**

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I, SHERRI R. CARTER, Clerk of this Court, certify that

Issac M. Pachulski, Bar No. 62337

was duly admitted to practice in this Court on December 20, 1974

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and is in good standing as a member of the Bar of this Court.

Dated at Los Angeles, California

on October 4, 2007  
*DATE*

SHERRI R. CARTER, CLERK  
  
By Brenda T. Brannon  
Brenda Brannon, Deputy Clerk

## UNITED STATES DISTRICT COURT

## SOUTHERN DISTRICT OF NEW YORK

In re

Enron Creditors Recovery Corp., debtor.

Chapter 11  
Case No. 01-B-16034(AJG)

JP Morgan Chase Bank N.A., Appellant

07-cv-07757-CM

v.

Baupost Group L.L.C., Abrams Capital, LL.C.,  
AppelleesMOTION TO ADMIT COUNSEL  
*PRO HAC VICE*

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Matthew J. Gold, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Name:	Eric D. Winston
Firm's Name:	Stutman, Treister & Glatt Professional Corporation
Address:	1901 Avenue of the Stars, 12 <sup>th</sup> Floor
City/State/Zip:	Los Angeles, California 90067
Phone Number:	310-228-5600
Fax Number:	310-228-5788
Email Address:	ewinston@stutman.com

Eric D. Winston, is a member in good standing of the Bar of the State of California.

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There are no pending disciplinary proceedings against Eric D. Winston in any state or Federal Court.

Dated: October 11, 2007  
City, State: New York, New York

Respectfully submitted,



Matthew J. Gold (SDNY Bar No. MJG 7326)  
Kleinberg, Kaplan, Wolff & Cohen, P.C.  
551 Fifth Avenue, 18<sup>th</sup> Floor  
New York, NY 10176  
Telephone Number: 212-880-9827/  
Fax Number: 212-986-8866  
Email: mgold@kkwc.com

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

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**In re**  
**Enron Creditors Recovery Corp., Debtor.**

**Chapter 11**  
**Case No. 01-B-16034(AJG)**

**JP Morgan Chase Bank N.A., Appellant**

**07-cv-07757-CM**

**v.**

**Baupost Group L.L.C., Abrams Capital, LL.C.,**  
**Appellees**

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**DECLARATION OF MATTHEW J. GOLD IN  
SUPPORT OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

I, Matthew J. Gold, hereby declare:

1. I am Of Counsel to the law firm of Kleinberg, Kaplan, Wolff & Cohen P.C. in the above captioned case. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit Eric D. Winston ("Mr. Winston") as counsel *pro hac vice* to represent The Baupost Group L.L.C. and Abrams Capital L.L.C. in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1983. I am also admitted to the bar of the United States District Court for the Southern District of New York. I am in good standing with this Court.
3. I have known Mr. Winston for approximately six months.
4. Mr. Winston is a shareholder at the law firm of Stutman, Treister & Glatt Professional Corporation located at 1901 Avenue of the Stars, 12<sup>th</sup> Floor, Los Angeles, California.
5. I have found Mr. Winston to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Mr. Winston is a member in good standing of the Bar of the State of California, the United States District Courts for the Central, Eastern, Northern and Southern Districts of California, and the United States Courts of Appeal for the Third, Ninth and Tenth Circuits. A Certificate of Good Standing for Mr. Winston from the United States District Court for the Central District of California is attached hereto as Exhibit A.

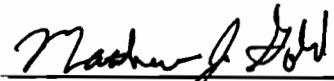
7. Accordingly, I am pleased to move for the admission of Mr. Winston, *pro hac vice*.

8. I respectfully submit a proposed form of order granting the admission of Mr. Winston, *pro hac vice*, which is attached hereto as Exhibit B.

9. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

WHEREFORE it is respectfully requested that the motion to admit Eric D. Winston, *pro hac vice*, to represent Appellees in the above-captioned matter, be granted.

Executed on October 11, 2007  
New York, New York

  
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Matthew J. Gold  
S.D.N.Y. Bar Code MJG 7326

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# United States District Court

## Central District of California

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### CERTIFICATE OF GOOD STANDING

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I, SHERRI R. CARTER, Clerk of this Court, certify that

Eric D. Winston, Bar No. 202407

was duly admitted to practice in this Court on December 1, 1999

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and is in good standing as a member of the Bar of this Court.

Dated at Los Angeles, California

on October 4, 2007  
DATE

SHERRI R. CARTER, CLERK  
  
By Brenda Brannon  
Brenda Brannon, Deputy Clerk

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

In re

Enron Creditors Recovery Corp., debtor.

**JP Morgan Chase Bank N.A., Appellant**

v.

**Baupost Group L.L.C., Abrams Capital, LL.C.,  
Appellees**

**Chapter 11  
Case No. 01-B-16034(AJG)**

**07-cv-07757-CM**

**CERTIFICATE OF SERVICE**

I, Marc R. Rosen, counsel at Kleinberg, Kaplan, Wolff & Cohen, P.C., hereby certify that, on October 12, 2007, I caused the Motion To Admit Counsel *Pro Hac Vice* dated October 11, 2007 (relating to Isaac M. Pachulski), the Motion To Admit Counsel *Pro Hac Vice* dated October 11, 2007 (relating to Eric D. Winston), the Declaration of Matthew J. Gold in Support of Motion To Admit Counsel *Pro Hac Vice* executed on October 11, 2007 (relating to Isaac M. Pachulski) and attached exhibit, the Declaration of Matthew J. Gold in Support of Motion To Admit Counsel *Pro Hac Vice* executed on October 11, 2007 (relating to Eric D. Winston) and attached exhibit, the Proposed Order for Admission *Pro Hac Vice* on Written Motion (relating to Isaac M. Pachulski), and the Proposed Order for Admission *Pro Hac Vice* on Written Motion (relating to Eric D. Winston), to be served upon the following addresses by United States first-class mail delivery:

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HAHN & HESSEN LLP  
488 Madison Avenue  
New York, New York 10022

Dated: October 12, 2007



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Marc R. Rosen